



IN THE UNITED STATES DISTRICT COURT FOR THE

EASTERN DISTRICT OF VIRGINIA

Alexandria Division

UNITED STATES OF AMERICA)	No. 1:14-CR-230 (AJT)
)	
v.)	COUNT ONE:
)	
FARHIA HASSAN,)	Conspiracy to Provide Material
a/k/a Ummu Ibrahiim,)	Support to a Foreign Terrorist
a/k/a Bintu Hassan)	Organization (18 U.S.C. § 2339B)
)	
FARDOWSA JAMA MOHAMED,)	
a/k/a Umu Camaar,)	
)	
and)	
)	
BARIRA HASSAN ABDULLAHI,)	
a/k/a Barida,)	
)	
Defendants)	

SECOND SUPERSEDING INDICTMENT

February 2019 Term – At Alexandria

GENERAL ALLEGATIONS

At all times relevant to this Second Superseding Indictment:

1. Defendant Farhia HASSAN, a/k/a Ummu Ibrahiim, a/k/a Bintu Hassan, was a resident of the Netherlands who conspired with the individuals discussed below to provide material support and resources to a Designated Foreign Terrorist Organization. During the course of the conspiracy, HASSAN made regular monthly payments to support al-Shabaab's terrorist and military operations in Somalia and elsewhere.



2. Defendant Fardowsa Jama MOHAMED, a/k/a Umu Camaar, was a resident of Nairobi, Kenya. MOHAMED received payments from HASSAN to support al-Shabaab.
3. Defendant Barira Hassan ABDULLAHI, a/k/a Barida, was a resident of Hargeisa and Erigavo, Somaliland. ABDULLAHI received payments from HASSAN to support al-Shabaab.
4. Muna Osman Jama, a/k/a Umu Luqmaan, a/k/a Taaibah was a resident of Annandale, Virginia, in the Eastern District of Virginia, and with Dhirane and Esse was a co-conspirator with defendants HASSAN, MOHAMED, and ABDULLAHI.
5. Hinda Osman Dhirane was a resident of Seattle, Washington, and with Jama and Esse was a co-conspirator with defendants HASSAN, MOHAMED, and ABDULLAHI.
6. Amina Esse was a resident of Minneapolis, Minnesota, and with Jama and Dhirane was a co-conspirator with defendants HASSAN, MOHAMED, and ABDULLAHI.
7. The Harakat Shabaab al-Mujahidin – commonly known as al-Shabaab – was a terrorist group conducting a violent insurgency in Somalia. In 2008, the U.S. government designated al-Shabaab as a Foreign Terrorist Organization under section 219 of the Immigration and Nationality Act. In February 2012, the leaders of al-Shabaab and the terrorist group al-Qa'ida publicly announced the merger of the two groups.

The Chatrooms and the "Group of Fifteen"

8. The ISDAC (or "Dacwatu al-Tawhid") chatroom on PalTalk was a pro al-Shabaab online forum. The chatroom was used by al-Shabaab supporters to fundraise on behalf of the organization and also hosted live lectures by al-Shabaab leaders and clerics. One of these

was Sheikh Abdulkadir Mumin, an al-Shabaab cleric who at the time was a leader of al-Shabaab forces in the Galgala region of the Golis Mountains in Somalia. Another, Sheikh Hassan Hussein, had issued fatwahs that would have legitimized the killing of members of nonviolent political opponents of al-Shabaab. HASSAN, MOHAMED, and ABDULLAHI and their co-conspirators used the ISDAC chatroom when looking for new contributors to support al-Shabaab.

9. Jama invited Esse to join a private PalTalk chatroom in which HASSAN and a group of approximately fifteen women participated. This "Group of Fifteen" met regularly. Only those participants from the larger ISDAC chatroom who had been or could potentially be persuaded to become committed supporters of al-Shabaab were invited into the Group of Fifteen. The Group of Fifteen was part and parcel of al-Shabaab's fundraising network and was integrated organizationally into al-Shabaab's structure as a Foreign Terrorist Organization.

10. The "Group of Fifteen" hailed from numerous countries including the Netherlands, the United States, the United Kingdom, Sweden, Denmark, Kenya, and Somalia, among a number of others. The principal purposes of the meetings in the private chatroom included collecting monthly payments that each group member made in support of al-Shabaab, providing a forum for lectures by leading al-Shabaab figures, and discussing al-Shabaab victories and related current events involving al-Shabaab.

11. The money collected by the "Group of Fifteen" went principally to two groups, the "Hargeisa side" and the "Nairobi side." MOHAMED was Jama's "Nairobi side" conduit and lived in Kenya. Dhirane's conduits on the "Hargeisa side" were ABDULLAHI and co-

conspirator Hodan Ismail Hassan, a/k/a “Umu Mohamed.” Dhirane’s “Hargeisa side” provided funds to supply military equipment to al-Shabaab fighters in the Golis Mountain region. Jama’s “Nairobi side” funded two al-Shabaab safehouses in Kenya, one of which stored weapons and was a staging area for al-Shabaab attacks. MOHAMED and ABDULLAHI were operationally integrated into the al-Shabaab organization and coordinated their activities with its broader organizational goals over a period spanning multiple years. MOHAMED and ABDULLAHI had access to leadership and coordinated their own activities in light of the specific needs of al-Shabaab, as events unfolded as a result of al-Shabaab military operations. Both ABDULLAHI and MOHAMED knew that HASSAN had sent money to them for the benefit of al-Shabaab.

HASSAN’s Recruitment of Other Women To Support al-Shabaab

12. Part of the mission of the “Group of Fifteen” was to recruit other women to provide funds to al-Shabaab. On occasion, HASSAN, Jama, Dhirane, and their co-conspirators discussed how to deceive other woman to pay money for al-Shabaab.

13. On or about September 23, 2013, HASSAN and Dhirane discussed two “sisters” who in lived in the Netherlands at the time but who had come from Hargeisa. HASSAN had convinced them to send money to the “Hargeisa-side” conduits. HASSAN related to Dhirane that she had told the women that the money was for “orphans” in Hargeisa. So that the co-conspirators’ true purposes would not be discovered, HASSAN and Dhirane discussed whether they should tell the women that the money was for orphans or that it was to help feed the hungry. Later, because ABDULLAHI lived in the same town as the two women, Dhirane became concerned that if the two Netherlands women visited Hargeisa, they would want to see the

“orphans” whom they were led to believe they were supporting. On or about September 24, 2013, Dhirane and Hodan discussed these concerns and decided that the risk of exposure was too great to accept the money that HASSAN had solicited from the Netherlands women. On or about September 24, 2013, Dhirane and Jama decided that they would tell HASSAN to send her own money to the “Nairobi side.”

*Hassan’s Intent To Provide Support for
al-Shabaab’s Military Purposes and Terrorist Acts.*

14. On or about February 16, 2013, HASSAN and Jama discussed the murder of a renowned Islamic scholar, Sheikh Abdulkadir Nur Farah, who had been praying inside a mosque at the time. Al-Shabaab, whom the cleric opposed, claimed responsibility for the assassination. HASSAN commented “LOL” – for “laughing out loud” – when discussing the killing of the cleric.

15. In or about mid-2012, al-Shabaab suffered losses to AMISOM forces and was being pushed out of Mogadishu and nearby Afgoye. On or about June 7, 2012, Jama and Dhirane discussed the need for urgency in collecting money from their co-conspirators to obtain trucks for al-Shabaab’s retreat. On or about June, 8, 2012, Jama contacted HASSAN to tell her of al-Shabaab’s need for trucks to retreat from Mogadishu and Afgoye. HASSAN pledged to send \$300 to help al-Shabaab obtain the vehicles. Jama later informed Dhirane that HASSAN had already sent money to the Hargeisa-side conduits, and would also send \$300 for the vehicles.

The Value of the Funds Provided to al-Shabaab

16. In a purposeful effort to avoid detection, the defendants and their co-conspirators sent small individual amounts of money to al-Shabaab. In the aggregate, however, the “Group of

Fifteen” contributed thousands of dollars to al-Shabaab, both from their direct contributions and from those they solicited from other women around the globe. Moreover, participants in the “Group of Fifteen” were asked to respond with much greater amounts to meet certain specific needs of al-Shabaab, such as HASSAN’s payment expressly for the purpose of assisting al-Shabaab to retreat to the Golis Mountains.

17. In June 2012, HASSAN and Jama also discussed a meeting of seven unidentified women in which each pledged between \$300 and \$1,000 for the same purpose. In or about January 2013, HASSAN contacted Jama to ask to whom HASSAN should send a payment of \$1,000.

18. An AK-style assault rifle could be purchased in Somalia for approximately \$250. Vehicles for military adaptation could be purchased for as little as \$2,500. The money provided by HASSAN and her conspirators was therefore of significant value to al-Shabaab.

COUNT ONE

Conspiracy to Provide Material Support to a Foreign Terrorist Organization

THE GRAND JURY CHARGES THAT:

The General Allegations above are incorporated here by reference.

From at least in or about February 2011 and continuing through at least in or about July 2014, in the Eastern District of Virginia and elsewhere, the defendants,

FARHIA HASSAN,

FARDOWSA JAMA MOHAMED, and

BARIRA HASSAN ABDULLAHI,

conspired with each other and with Jama, Dhirane, and Esse, and with others known and unknown to the Grand Jury to knowingly provide material support and resources to a designated foreign terrorist organization, that is, al-Shabaab.

The acts undertaken by the defendants as alleged in the General Allegations constituted overt acts to further the conspiracy and to accomplish its unlawful objects.

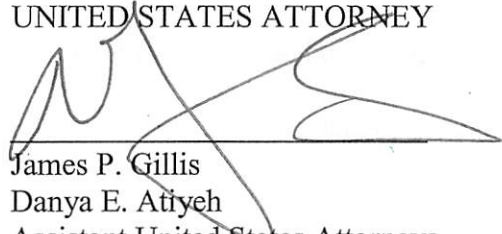
(In violation of Title 18, United States Code, Section 2339B)

A TRUE BILL

Pursuant to the E-Government Act,
The original of this page has been filed
under seal in the Clerk's Office

G. ZACHARY TERWILLIGER
UNITED STATES ATTORNEY

By:



James P. Gillis
Danya E. Atriyeh
Assistant United States Attorneys